Message

From: Anthony D'Souza [anthony@airalliancehouston.org]

Sent: 9/9/2021 5:44:20 PM

To: Polk, Jonna [Polk.Jonna@epa.gov]

Subject: Ethylene Oxide Fenceline Monitoring

Attachments: Denka Fenceline Monitoring - CAA Information Request.pdf

Hi Jonna,

I hope you're doing well!

I just wanted to follow up on a consistent point made throughout the EtO community meetings over the past month regarding fenceline monitoring of EtO emitting facilities. The continued response given by EPA representatives to community members asking for increased monitoring was that this isn't possible and not something that could be undertaken or asked of industry.

However, just a few months ago the EPA and Region 6 required fenceline monitoring to be conducted at Denka Performance LLC (a neoprene manufacturing facility in LaPlace, Louisiana) under section 114 of the CAA (full request attached below). This clearly demonstrates that fenceline monitoring is allowable and enforceable under current regulations and could possibly be extended to the ethylene oxide emitting facilities across Texas and Louisiana as well - especially since these are already facilities of concern according to the OIG. Such information would be immensely beneficial to communities residing near these locations.

I just wanted to understand the disconnect between these two actions/statements by the EPA - is fenceline monitoring for EtO simply "not possible" as was mentioned at the community meetings, or are there other reasons. If you could provide any insight or forward this email to the appropriate contacts, it would be greatly appreciated!

Thank you! Anthony D'Souza Air Alliance Houston

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